December 21, 2001

Mr. Charles Mitchell
Polygon Company
P.O. Box 176
Walkerton, Indiana 46574

Re: 141-14574
First Administrative Amendment to
Part 70 141-10871-00062

Dear Mr. Mitchell:

Polygon Company located at 103 Industrial Park Drive, Walkerton, Indiana 46574 was issued a Part 70 permit on April 18, 2001 for a fiberglass reinforced plastic tubing manufacturing plant. A letter requesting a change in the Part 70 permit was received on June 20, 2001, with additional information received on September 28, 2001 and November 26, 2001. Pursuant to 326 IAC 2-7-11, the Part 70 permit is hereby administratively amended as follows (changes are bolded and deletions are struck through for emphasis):

(1) The source has removed one (1) pultrusion line to decrease their total number down from 10 to 9.

Section A.3(a) has been amended to remove one pultrusion line as follows:

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Industrial Park Drive Plant

(a) ~~Ten (10)~~ **Nine (9)** pultrusion lines, identified as PL1 through PL~~10~~ **9,** constructed in 1994, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.

This changed will also be reflected in Section D.1. description Table as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Fiberglass Reinforced Plastics Operations

Industrial Park Drive Plant

(a) ~~Ten (10)~~ **Nine (9)** pultrusion lines, identified as PL1 through PL~~10~~ **9,** constructed in 1994, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.

(b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat 50 tubes per hour, equipped with dry filters for air pollution control, and exhausting to stacks V4 and V5.

(c) One (1) gel coat spray booth, identified as B2, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity of 53.5 pounds per hour, equipped with dry filters for air pollution control, and exhausting to stacks V7 and V8.

(d) One (1) filament winding area, identified as F2, constructed in 1998, with a maximum capacity of 47.0 pounds per hour, emissions are fugitive.

Tennessee Street Plant

(e) Nine (9) resin dip tanks, identified as RD1 through RD9, constructed in 1997, with a maximum capacity of 95.0 pounds per hour, exhausting to stack V6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

The Reporting Form on Page 35 of 38 of the permit will also be amended to reflect the corrected number of pultrusion lines.

(2) The source proposes to construct the following equipment, which are classified as insignificant activities:

(a) Research and Development operations - which will produce parts for new product testing and marketing research samples for a potential new product designated as continuous fiber thermoplastic (CFT).

(b) Three (3) spindle winder attachment and one (1) 6-spindle winder. This installation will not change the PTE established under unit (c) Large Filament Wind Grinding Area of Section A.4

Section A.4 will be amended to add the above item (a) and be identified in the Part 70 permit as item (i). Item (b) above will be incorporated in Section A.4 item (c) of the Part 70 permit, now item (e).

(3) The source requests that Section A.4 of the Part 70 permit be amended to specifically list all the emission units listed in the TSD of the Part 70 permit and the exhibit A of the amendment

application.

Section A.4 is amended as follows:

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) **Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.**

(1) One (1) natural gas-fired boiler with heat input of 0.85 MMBtu per hour. [326 IAC 6-2-4]
(2) Ten (10) natural gas-fired curing ovens,
(3) Four (4) radiant heaters, Fifteen (15) space heaters and three (3) air make-up units.

(b) Various machining operations where aqueous cutting coolant continuously floods the machining interface; seventeen (17) grinders, one (1) filter press, five (5) auto saws, nine (9) chop saws, eight (8) small grinding machines, seven (7) lathes, three (3) bandsaws, eleven (11) dielectric testers, twelve (12) drill presses, five (5) computerized mills, one (1) air rotation unit, two (2) fiberglass winding line, two (2) wet cutting/grinding lines and one (1) auto deburr.

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]

(d) Paved and unpaved roads and parking lots with public access.

(e) **Three (3) spindle winder attachment and one (1) 6-spindle winder**, one (1) fiberglass trimming and grinding area known as the Large Filament Wind Grinding Area, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector. [326 IAC 6-3-2]

(f) One (1) fiberglass trimming and grinding area known as the US6, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector. [326 IAC 6-3-2]

(g) Six (6) electric ovens for fiberglass curing and drying, emitting less than 12.5 pounds per day of any combination of HAPs.

(h) Particulate emissions from the pultrusion area of less than 5 pounds per hour or 25 pounds per day, controlled by a baghouse.

(i) Research and Development operations - which will produce parts for new product testing and marketing research samples for a potential new product designated as continuous fiber thermoplastic (CFT).

This change will also be reflected in Section D.2 as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) One (1) natural gas-fired boiler with heat input of 0.85 MMBtu per hour. [326 IAC 6-2-4]
(2) Ten (10) natural gas-fired curing ovens,
(3) Four (4) radiant heaters, Fifteen (15) space heaters and three (3) air make-up units.

(b) Various machining operations where aqueous cutting coolant continuously floods the machining interface; seventeen (17) grinders, one (1) filter press, five (5) auto saws, nine (9) chop saws, eight (8) small grinding machines, seven (7) lathes, three (3) bandsaws, eleven (11) dielectric testers, twelve (12) drill presses, five (5) computerized mills, one (1) air rotation unit, two (2) fiberglass winding line, two (2) wet cutting/grinding lines and one (1) auto deburr.

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]

(d) Paved and unpaved roads and parking lots with public access.

(e) **Three (3) spindle winder attachment and one (1) 6-spindle winder**, one (1) fiberglass trimming and grinding area known as the Large Filament Wind Grinding Area, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector. [326 IAC 6-3-2]

(f) One (1) fiberglass trimming and grinding area known as the US6, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector. [326 IAC 6-3-2]

(g) Six (6) electric ovens for fiberglass curing and drying, emitting less than 12.5 pounds per day of any combination of HAPs.

(h) Particulate emissions from the pultrusion area of less than 5 pounds per hour or 25 pounds per day, controlled by a baghouse.

(i) Research and Development operations - which will produce parts for new product testing and marketing research samples for a potential new product designated as continuous fiber thermoplastic (CFT).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Condition D.2.4 is revised to include the additional insignificant activities as follows:

D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the fiberglass trimming and grinding area known as US6 shall not exceed 1.029 pounds per hour when operating at a process weight rate of 254 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ Where: E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emission rate from various machining operations listed as item (b) shall not exceed the PM allowable established using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ Where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

All other conditions of the Part 70 permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised Part 70 permit pages to the front of the original Part 70 permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

APD

cc: File - St Joseph County
U.S. EPA, Region V
St. Joseph County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Polygon Company
103 Industrial Park Drive
Walkerton, Indiana 46574

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 141-10871-00062	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 18, 2001
1st Administrative Amendment No.: T 141-14574	Pages Affected : 5, 6, 25, 29, 30, 31, 35 Pages Added: 6a
Issued by: Paul Dubenetzky, Branch Chief Permit Branch Office of Air Quality	Issuance Date: December 21, 2001

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass reinforced plastic tubing manufacturing source.

Responsible Official:	Charles Mitchell
Source Address:	103 Industrial Park Drive, Walkerton, Indiana 46574
Mailing Address:	P.O. Box 176, Walkerton, Indiana 46574
Phone Number:	219 - 586 - 3145
SIC Code:	3089
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This fiberglass reinforced plastic tubing manufacturing company consists of two (2) plants:

(a) Plant 1 is located at 103 Industrial Park Drive, Walkerton, Indiana 46574; and

(b) Plant 2 is located on Tennessee Street, Walkerton, Indiana 46574.

Because the two (2) plants are owned by one (1) company, are adjacent (0.25 miles apart), have the same SIC codes, and because all products manufactured at Plant 2 are transferred to Plant 1 for final fabrication, they will be considered one (1) source. In addition, both plants were submitted in a single Part 70 application.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Industrial Park Drive Plant

(a) Nine (9) pultrusion lines, identified as PL1 through PL9, constructed in 1994, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.

(b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat 50 tubes per hour, equipped with dry filters for air pollution control, and exhausting to stacks V4 and V5.

(c) One (1) gel coat spray booth, identified as B2, constructed in 1998, for the surface

coating of fiberglass reinforced plastic tubing, with a maximum capacity of 53.5 pounds per hour, equipped with dry filters for air pollution control, and exhausting to stacks V7 and V8.

(d) One (1) filament winding area, identified as F2, constructed in 1998, with a maximum capacity of 47.0 pounds per hour, emissions are fugitive.

Tennessee Street Plant

(e) Nine (9) resin dip tanks, identified as RD1 through RD9, constructed in 1997, with a maximum capacity of 95.0 pounds per hour, exhausting to stack V6.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) One (1) natural gas-fired boiler with heat input of 0.85 MMBtu per hour. [326 IAC 6-2-4]
(2) Ten (10) natural gas-fired curing ovens,
(3) Four (4) radiant heaters, Fifteen (15) space heaters and three (3) air make-up units.

(b) Various machining operations where aqueous cutting coolant continuously floods the machining interface; seventeen (17) grinders, one (1) filter press, five (5) auto saws, nine (9) chop saws, eight (8) small grinding machines, seven (7) lathes, three (3) bandsaws, eleven (11) dielectric testers, twelve (12) drill presses, five (5) computerized mills, one (1) air rotation unit, two (2) fiberglass winding line, two (2) wet cutting/grinding lines and one (1) auto deburr.

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]

(d) Paved and unpaved roads and parking lots with public access.

(e) Three (3) spindle winder attachment and one (1) 6-spindle winder, one (1) fiberglass trimming and grinding area known as the Large Filament Wind Grinding Area, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector. [326 IAC 6-3-2]

(f) One (1) fiberglass trimming and grinding area known as the US6, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector. [326 IAC 6-3-2]

(g) Six (6) electric ovens for fiberglass curing and drying, emitting less than 12.5 pounds per day of any combination of HAPs.

(h) Particulate emissions from the pultrusion area of less than 5 pounds per hour or 25 pounds per day, controlled by a baghouse.

(i) Research and Development operations - which will produce parts for new product testing and marketing research samples for a potential new product designated as continuous fiber thermoplastic (CFT).

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Fiberglass Reinforced Plastics Operations

Industrial Park Drive Plant

(a) Nine (9) pultrusion lines, identified as PL1 through PL9, constructed in 1994, with a maximum capacity of 83.8 pounds per hour, exhausting to stacks V2 and V3.

(b) One (1) spray booth, identified as B1, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity to coat 50 tubes per hour, equipped with dry filters for air pollution control, and exhausting to stacks V4 and V5.

(c) One (1) gel coat spray booth, identified as B2, constructed in 1998, for the surface coating of fiberglass reinforced plastic tubing, with a maximum capacity of 53.5 pounds per hour, equipped with dry filters for air pollution control, and exhausting to stacks V7 and V8.

(d) One (1) filament winding area, identified as F2, constructed in 1998, with a maximum capacity of 47.0 pounds per hour, emissions are fugitive.

Tennessee Street Plant

(e) Nine (9) resin dip tanks, identified as RD1 through RD9, constructed in 1997, with a maximum capacity of 95.0 pounds per hour, exhausting to stack V6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] **Pultrusion Lines**

Use of resins and solvents shall be limited such that the potential to emit (PTE) of Volatile Organic Compounds (VOC) shall be less than 25 tons per consecutive 12 month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6, (New Facilities: General Reduction Requirements), does not apply. Compliance with this limit shall be determined based upon the following criteria:

(a) Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

(b) The emission factors approved for use by IDEM, OAQ for polyester and vinyl resin shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, for open molding and filament winding, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) One (1) natural gas-fired boiler with heat input of 0.85 MMBtu per hour. [326 IAC 6-2-4]
(2) Ten (10) natural gas-fired curing ovens,
(3) Four (4) radiant heaters, Fifteen (15) space heaters and three (3) air make-up units.

(b) Various machining operations where aqueous cutting coolant continuously floods the machining interface; seventeen (17) grinders, one (1) filter press, five (5) auto saws, nine (9) chop saws, eight (8) small grinding machines, seven (7) lathes, three (3) bandsaws, eleven (11) dielectric testers, twelve (12) drill presses, five (5) computerized mills, one (1) air rotation unit, two (2) fiberglass winding line, two (2) wet cutting/grinding lines and one (1) auto deburr.

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]

(d) Paved and unpaved roads and parking lots with public access.

(e) Three (3) spindle winder attachment and one (1) 6-spindle winder, one (1) fiberglass trimming and grinding area known as the Large Filament Wind Grinding Area, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector. [326 IAC 6-3-2]

(f) One (1) fiberglass trimming and grinding area known as the US6, that does not produce fugitive emissions, with PM emissions less than 5 pounds per hour or 25 pounds per day, and equipped with a Torit Donaldson dust collector. [326 IAC 6-3-2]

(g) Six (6) electric ovens for fiberglass curing and drying, emitting less than 12.5 pounds per day of any combination of HAPs.

(h) Particulate emissions from the pultrusion area of less than 5 pounds per hour or 25 pounds per day, controlled by a baghouse.

(i) Research and Development operations - which will produce parts for new product testing and marketing research samples for a potential new product designated as continuous fiber thermoplastic (CFT).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 0.85 MMBtu per hour heat input boiler shall be limited to 0.60 pounds per MMBtu heat input. 326 IAC 6-2-4 states that for a maximum operating capacity less than 10 MMBtu, that the emissions shall be limited to 0.60 pounds per MMBtu heat input. Therefore, no calculations were required.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths

degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the fiberglass trimming and grinding area known as US6 shall not exceed 1.029 pounds per hour when operating at a process weight rate of 254 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ Where: E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emission rate from various machining operations listed as item (b) shall not exceed the PM allowable established using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by the use of the equation:

$E = 4.10 P^{0.67}$ Where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.5 Particulate Matter (PM)

In order to comply with Conditions C.1 and D.2.3, the Torit Donaldson dust collectors for PM control shall be in operation at all times when the Large Filament Wind Grinding Area and the fiberglass trimming and grinding area known as US6 are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Polygon Company
Source Address: 103 Industrial Park Drive, Walkerton, Indiana 46574
Mailing Address: P.O. Box 176, Walkerton, Indiana 46574
Part 70 Permit No.: T 141-10871-00062
Facility: Pultrusion Lines, Identified as PL1 through PL9
Parameter: Volatile Organic Compounds (VOC)
Limit: Use of resins and solvents shall be limited such that the potential to emit (PTE) of Volatile Organic Compounds (VOC) shall be less than 25 tons per consecutive 12 month period.

Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

The emission factors approved for use by IDEM, OAQ for polyester and vinyl resin shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, for open molding and filament winding, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.